

# **Exhibit A**

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June 25, 2025

**Via Email:** [rodneyolivermusic@gmail.com](mailto:rodneyolivermusic@gmail.com)

Mr. Rodney David Oliver  
11074 Oso Avenue  
Chatsworth, CA 91311

Re: *The Barry White Family Trust U/A/D: December 19, 1980, By its Duly Empowered Trustees v. Cooley et al;* Case No. 24-cv-07509 (DLC)

Dear Mr. Oliver:

As you are aware, your written responses and objections to Plaintiff's First Request for the Production of Documents ("Plaintiff's FRP") and Plaintiff's First Interrogatories were due to be served by no later than Friday June 13, 2025. You were also to have begun producing documents responsive to Plaintiff's FRP on that date. As specifically set forth below, this letter addresses the multiple deficiencies and failures in the discovery responses you have provided to date.

**PLAINTIFF'S PARTICULARIZED DEFICIENCY NOTICE**

**I. Plaintiff's FRP Served 5/16/25**

To date, you have failed to provide any written responses to Plaintiff's FRP. You have also failed to produce any responsive documents.

As you have propounded no objections to any of Plaintiff's FRP's, demand is hereby made that you produce all documents and materials which are responsive to the Plaintiff's FRPs, confirm that all responsive documents exist and after you have completed your production, verify that all responsive documents have been produced.

For clarity, and to the extent you intend to claim that you do not possess documents or materials which are responsive, you must provide the following information:

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- (i) whether any responsive documents or materials exist or ever existed;
- (ii) whether any responsive documents or materials ever existed in your possession, custody or control; and
- (iii) if the answer to either (i) or (ii) is yes, then identify those documents, describe the steps you have taken to obtain them, and explain where they can be found or why they no longer exist.

**II. Plaintiff's First Interrogatories – Served 5/16/25**

On Saturday, May 14, 2025 you served, via email, “Defendant’s Responses and Objections to Plaintiffs’ First Set of Interrogatories.”

In addition to the specific deficiencies which we particularize with respect to each interrogatory below, we note the following defects:

- i. You have failed to respond to each interrogatory, to the extent it is not objected to, under oath. Fed. R. Civ. P. 33(b)(3);
- ii. You have failed to timely respond to Plaintiff’s Interrogatories. Fed. R. Civ. P. 33(b)(2);
- iii. To the extent you have stated objections, you have failed to state them with specificity. Fed. R. Civ. P. 33(b)(4);
- iv. You have failed to comply with no. 34 of the Instructions for Plaintiff’s First Interrogatories, which clearly provides that each interrogatory should be quoted in full immediately preceding the response. As set forth below, in most cases you have failed to quote the interrogatory in full prior to responding – and it appears that this has resulted in confusion and nonresponsive answers;
- v. It appears that you created your answers to the Plaintiff’s First Interrogatories using AI generated responses. We respectfully request that all records relating to the creation of your responses be identified and retained for discovery purposes, and be provided.

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**INTERROGATORY NO. 1**

**State the name and address of the individual signing the answers to these Interrogatories and each person who was consulted in connection with answering these Interrogatories, indicating the specific interrogatory that each person was consulted in connection therewith.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Identify each person who assisted you in responding to these Interrogatories.”

**YOUR RESPONSE:** Rodney Oliver, Defendant Anterine Jackson.

**DEFICIENCIES:** You have propounded no objection to this Interrogatory. You have failed to provide a complete response to the Interrogatory including, but not limited to, Anterine Jackson’s address as well as the specific Interrogatories regarding which you conferred with this individual. Please update the response and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 2**

**Identify the manner and technology in which each of the Defendants developed and created *Everlasting Bass*, as well as the existence, custodian, location, and general description of any documents relevant thereto.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Describe in detail the creation of *Everlasting Bass*, including authorship, production, recording, and instrumentation.”

**YOUR RESPONSE:** Objection. Overbroad and unduly burdensome. Subject to and without waiving objection: *Everlasting Bass* was recorded in 1987 at Skip Sailor Recording using analog equipment.

**DEFICIENCIES:** You have objected that this interrogatory is “overbroad and unduly burdensome.” First, it is unclear whether you are objecting to the Plaintiff’s Interrogatory No. 2, or your false recital thereof. For example, Plaintiff’s Interrogatory No. 2 does not seek any information on the “instrumentation” relating to *Everlasting Bass*. Please further note that the grounds for objecting to any interrogatory must be stated with specificity. Fed. R. Civ. P. 33(b)(4). See also *Jacoby v. Hartford Life & Accident Ins. Co.*, 254 F.R.D. 477, 478 (S.D.N.Y.2009); *Compagnie Francaise d'Assurance Pour le Commerce Exterieur v. Phillips Petroleum Co.*, 105 F.R.D. 16, 42 (S.D.N.Y.1984) (citation omitted). Kindly provide a detailed explanation as to basis and grounds for this objection.



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Additionally, your response is incomplete in that it fails to provide information relating to the current custodian, location, and general description of any documents relevant to the creation of *Everlasting Bass*. Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 3**

**Identify all individuals by name and address, involved in writing, developing and creating *Everlasting Bass*.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Identify the person(s) who authored *Everlasting Bass*.”

**YOUR RESPONSE:** Rodney Oliver.

**DEFICIENCIES:** You have propounded no objection to this Interrogatory. Your false recital of this Interrogatory limits the scope of the inquiry, and your response appears to be incomplete. For example, there are multiple copyright registrations for *Everlasting Bass* which include the names of other individuals listed as authors including, but not limited to Joe Cooley and Jeff Page (*See Oliver et al v. Barry White Family Trust et al*, Case No. 25-cv-03602 (S.D.N.Y.), Dkt. 1, p. 40). Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 4**

**Describe in detail Defendant Oliver’s and Defendant Cooley’s business relationship when creating *Everlasting Bass* including, but not limited to, the financial terms.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Identify each person or entity with an ownership interest in *Everlasting Bass*.”

**RESPONSE:** Solely as it pertains to the issues in this lawsuit, Rodney Oliver is the owner of the composition “*Everlasting Bass*.”

**DEFICIENCIES:** You have propounded no objection to this Interrogatory. Your false recital of this Interrogatory completely changes the question being asked. Plaintiff did not request your assessment of what ownership interests pertain to this lawsuit. This answer is nonresponsive and incomplete. Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

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### **INTERROGATORY NO. 5**

**Describe in detail any authorization you have received to copy or otherwise use Plaintiff's Work or any element of Plaintiff's Work, including (a) who provided the authorization; (b) what rights were granted by the authorization; (c) the terms and conditions of the authorization; (d) how the authorization was communicated to you; and (e) the date you obtained the authorization.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** "State whether you received authorization to use Plaintiff's Work in "Everlasting Bass" or "Like That."

**RESPONSE:** Defendants deny any use of Plaintiff's Work. No authorization was required or received.

**DEFICIENCIES:** You have propounded no objection to this Interrogatory. Your false recital of this Interrogatory limits the scope of the inquiry and completely changes the question being asked. Thus this answer is nonresponsive and incomplete. Moreover, to the extent that any portion of this answer is nonresponsive it shall be disregarded. Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

### **INTERROGATORY NO. 6**

**Identify all individuals, by name and address, who conducted reports, studies, surveys, investigations, research, development, analyses, or opinions concerning this Action or Plaintiffs' Work, including, but not limited to, any such documents comparing *Everlasting Bass* and *I'm Gonna Love You Just A Little More, Babe* or concerning any similarities between *Everlasting Bass* and *I'm Gonna Love You Just A Little More, Babe*.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** "Identify any expert who has provided analysis in this case."

**RESPONSE:** Defendants have not retained any expert at this time. Plaintiffs have not produced any deposited sheet music or other materials that would allow for a meaningful expert analysis. As Plaintiffs' claims involve a composition allegedly created before 1978, Defendants note that under 17 U.S.C. § 115 and related case law, the deposited sheet music or formal copyright registration materials are essential to determine the scope of any protectable expression. Defendants reserve the right to retain an expert after receiving such materials, and will supplement this response accordingly in compliance with Rule 26(a)(2) and the Court's scheduling order.

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**DEFICIENCIES:** You have propounded no objection to this Interrogatory. Your false recital of this Interrogatory limits the scope of the inquiry and completely changes the question being asked. Moreover, you have previously represented to the Court that you and/or counsel, acting on your behalf, have indeed consulted with an expert in connection herewith (*see e.g.*, Dkt. 64, p.26). Thus this answer is nonresponsive and incomplete. Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 7**

**Identify all individuals, by name and address, who were involved in negotiating the sample license agreement with Eric Weissman Music Licensing, Inc. for use of *Everlasting Bass* in *Like That*.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Identify all persons involved in licensing “Everlasting Bass.”

**RESPONSE:** Rodney Oliver, Necole Key, and third-party licensors. Subject to supplementation.

**DEFICIENCIES:** Defendant has propounded no objection to this Interrogatory. Your false recital of this Interrogatory limits the scope of the inquiry and completely changes the question being asked. Thus your answer is non-responsive and/or incomplete. You are to provide the names and addresses of the relevant individuals. Also, to the extent you are seeking to supplement the response at a later date, please identify what documents or information you would need to refer to in order to complete this list. Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 8**

**Identify all individuals, by name and address, in connection with the offer, discussion, negotiation or execution of any licenses or other agreements, including indemnification agreements, in connection with the song *Like That*.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Identify all attorneys consulted about this dispute.”

**RESPONSE:** Ryan Powers, Leron Rogers, and Tim Matson.

**DEFICIENCIES:** You have propounded no objection to this Interrogatory. Your false recital of this Interrogatory completely changes the question being asked. For example, Necole Key was clearly involved as an individual required to be identified. Thus your answer is non-responsive and/or incomplete. You are to provide the names and addresses of the relevant



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individuals. Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 9**

**Identify all communications that Defendants, and anyone on behalf of the Defendants, jointly or individually, posted on the Internet, including but not limited to any social media, regarding this Action.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Identify all social media posts you made regarding this litigation.”

**RESPONSE:** None.

**DEFICIENCIES:** You have propounded no objection to this Interrogatory. Your false recital of this Interrogatory limits the scope of the inquiry and changes the question being asked. Thus your answer is non-responsive and/or incomplete. Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate. For example, Necole Key was clearly involved as an individual required to be identified.

**INTERROGATORY NO. 10**

**Identify all communications that Defendant Oliver’s rights manager, Necole Key and/or Lady Key Management posted on social media regarding this Action.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “State all facts supporting your contention that Plaintiffs lack ownership in the copyrighted material.”

**RESPONSE:** Plaintiffs have not identified or registered the specific musical element allegedly infringed. Defendants reserve the right to supplement following expert review.

**DEFICIENCIES:** You have propounded no objection to this Interrogatory. Your false recital of this Interrogatory completely changes the question being asked. Thus your answer is non-responsive. Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 11**

**Identify all revenues received from *Everlasting Bass* for the last six (6) years.**

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**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “State all revenue received in connection with the accused works.”

**YOUR RESPONSE:** Defendants will produce non-privileged, responsive documents sufficient to show revenue, if any, in accordance with the Protective Order.

**DEFICIENCIES:** You have propounded no objection to this Interrogatory. Your false recital of this Interrogatory changes and limits the scope of the question being asked. Please update the response, produce the relevant documents and ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 12**

**Identify the total amount of monies received from granting a sample of *Everlasting Bass*, which includes a hook from Plaintiffs’ Work.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Describe the musical similarities and differences between “*Everlasting Bass*” and Plaintiff’s Work.”

**YOUR RESPONSE:** Objection. Calls for expert opinion. Subject to and without waiving: *Everlasting Bass* is an original composition that does not replicate the musical content of Plaintiff’s Work.

**DEFICIENCIES:** Your false recital of this Interrogatory completely changes the question being asked. Thus your objection and answer are non-responsive. Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 13**

**Identify the total amount of monies received from royalties or other income, including synchronization income, from *Like That*.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Identify all royalties you have received in connection with the accused works.”

**YOUR RESPONSE:** Objection. Overbroad and not limited in time. Subject to and without waiving: Other than as disclosed in response to Interrogatory No. 11, no additional royalties received.

**DEFICIENCIES:** Your false recital of this Interrogatory completely changes the question being asked. Thus your objection and answer are non-responsive. Moreover, you have



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objected that this interrogatory is “overbroad.” First, it is unclear whether you are objecting to the Plaintiff’s Interrogatory No. 13, or your false recital thereof. For example, Plaintiff’s Interrogatory No. 13 does not seek any information about monies generated by you from anything other than what you have received in connection with *Like That*. Please further note that the grounds for objecting to any interrogatory must be stated with specificity. Fed. R. Civ. P. 33(b)(4). See also *Jacoby v. Hartford Life & Accident Ins. Co.*, 254 F.R.D. 477, 478 (S.D.N.Y.2009); *Compagnie Francaise d'Assurance Pour le Commerce Exterieur v. Phillips Petroleum Co.*, 105 F.R.D. 16, 42 (S.D.N.Y.1984) (citation omitted). Kindly provide a detailed explanation as to basis and grounds for this objection.

Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 14**

**State the annual gross receipts received in connection with the reproduction, distribution, display, performance, sale, or other exploitation of Defendants’ Work, including but not limited to *Like That*, including identifying the methods used in calculating net profits.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “State the total gross income received from the exploitation of Everlasting Bass.”

**YOUR RESPONSE:** Objection. Vague and unduly burdensome. Subject to and without waiving: Defendants will produce documents sufficient to show gross income, if any, in accordance with the Protective Order.

**DEFICIENCIES:** Your false recital of this Interrogatory changes and limits the scope of the question being asked. Thus your objection and answer are non-responsive. Moreover, you have objected that this interrogatory is “vague and unduly burdensome.” Please note that the grounds for objecting to any interrogatory must be stated with specificity. Fed. R. Civ. P. 33(b)(4). See also *Jacoby v. Hartford Life & Accident Ins. Co.*, 254 F.R.D. 477, 478 (S.D.N.Y.2009); *Compagnie Francaise d'Assurance Pour le Commerce Exterieur v. Phillips Petroleum Co.*, 105 F.R.D. 16, 42 (S.D.N.Y.1984) (citation omitted). Kindly provide a detailed explanation as to basis and grounds for this objection.

Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 15**

**Describe in detail all facts that concern, support, or refute any claim by you that Plaintiff’s Work is not copyrightable, as well as the existence, custodian, location, and general**

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**description of any documents relevant thereto.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Identify any prior works you claim are sources for Plaintiff’s Work.”

**YOUR RESPONSE:** Jackie Mittoo’s instrumental catalog contains similar basslines. Plaintiffs have not demonstrated originality.

**DEFICIENCIES:** You have propounded no objection to this Interrogatory. Your false recital of this Interrogatory changes and limits the scope of the question being asked. Please update the response, produce the relevant documents and ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 16**

**Describe in detail all facts that concern, support, or refute any claim by you that Plaintiff does not own the copyright in Plaintiff’s Work, as well as the existence, custodian, location, and general description of any documents relevant thereto.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “State whether the portion of Plaintiff’s Work alleged to be copied has been registered.”

**YOUR RESPONSE:** Objection. Seeks publicly available information more appropriately obtained from Plaintiffs. Subject to and without waiving: Defendants are unaware of such a registration.

**DEFICIENCIES:** Your false recital of this Interrogatory completely changes the question being asked. Thus your objection and answer are non-responsive. Moreover, you have objected that this interrogatory is “overbroad.” First, it is unclear whether you are objecting to the Plaintiff’s Interrogatory No. 16, or your false recital thereof. For example, Plaintiff’s Interrogatory No. 16 does not seek any registration information about Plaintiff’s Work. Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 17**

**Identify any gross revenues received in connection with the exploitation of Defendants’ Work that you claim are not attributable to the infringement of Plaintiff’s Work, and describe in detail the basis for your claim.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Identify all revenue you’ve received unrelated to Plaintiff’s Work.”

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**YOUR RESPONSE:** Objection. Overbroad and not limited to relevant time or subject matter. Subject to and without waiving: Defendants have received unrelated income. Responsive documents will be produced to the extent relevant and proportional.

**DEFICIENCIES:** Your false recital of this Interrogatory completely changes the question being asked. Thus your objection and answer are non-responsive. Moreover, you have objected that this interrogatory is “overbroad and not limited to relevant time or subject matter.” First, it is unclear whether you are objecting to the Plaintiff’s Interrogatory No. 17, or your false recital thereof. For example, Plaintiff’s Interrogatory No. 17 does not seek any information about revenues unrelated to Defendants’ Work – which is the subject matter of this action. Please also note that the grounds for objecting to any interrogatory must be stated with specificity. Fed. R. Civ. P. 33(b)(4). See also *Jacoby v. Hartford Life & Accident Ins. Co.*, 254 F.R.D. 477, 478 (S.D.N.Y.2009); *Compagnie Francaise d'Assurance Pour le Commerce Exterieur v. Phillips Petroleum Co.*, 105 F.R.D. 16, 42 (S.D.N.Y.1984) (citation omitted). Kindly provide a detailed explanation as to basis and grounds for this objection.

Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 18**

**With respect to each of Defendant Oliver’s Counterclaims (Dkt. 70. ¶¶1-12), describe in detail the existence, custodian, location, and general description of any documents relevant thereto.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** “Identify all documents supporting your defenses.”

**YOUR RESPONSE:** Objection. Overbroad. Subject to and without waiving: Defendants will produce responsive, non-privileged documents in accordance with Rule 26 and the Protective Order.

**DEFICIENCIES:** Your false recital of this Interrogatory completely changes the question being asked. Thus your objection and answer are non-responsive. Moreover, you have objected that this interrogatory is “overbroad.” First, it is unclear whether you are objecting to the Plaintiff’s Interrogatory No. 18, or your false recital thereof. For example, Plaintiff’s Interrogatory refers specifically to Defendant Oliver’s Counterclaims – not the Defendants’ defenses generally. Please also note that the grounds for objecting to any interrogatory must be stated with specificity. Fed. R. Civ. P. 33(b)(4). See also *Jacoby v. Hartford Life & Accident Ins. Co.*, 254 F.R.D. 477, 478 (S.D.N.Y.2009); *Compagnie Francaise d'Assurance Pour le Commerce Exterieur v. Phillips Petroleum Co.*, 105 F.R.D. 16, 42 (S.D.N.Y.1984) (citation omitted). Kindly provide a detailed explanation as to basis and grounds for this objection.



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Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

**INTERROGATORY NO. 19**

**With respect to each of Defendant Cooley's Counterclaims (Dkt. 67. p.3), describe in detail the existence, custodian, location, and general description of any documents relevant thereto.**

**YOUR FALSE RECITAL OF THIS INTERROGATORY:** "Identify all facts related to Joe Cooley's involvement.

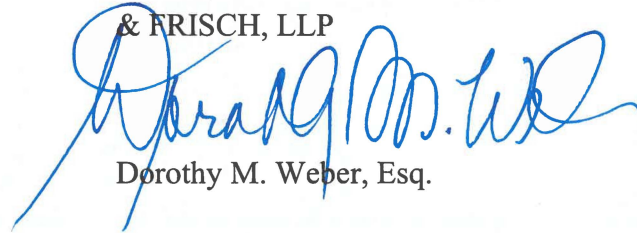
**YOUR RESPONSE:** Joe Cooley contributed to the original 1987 recording of "Everlasting Bass" as a performer under a work-for-hire arrangement. He did not claim authorship or ownership in the composition or sound recording.

**DEFICIENCIES:** Your false recital of this Interrogatory completely changes the question being asked. Thus your answer is non-responsive and/or incomplete. For example, Plaintiff's Interrogatory refers specifically to Defendant Oliver's Counterclaims and the documents and materials which are relevant thereto – not the Defendant's version of the 'facts.' Such statement is also contradicted by Dkt. 1, p. 40 in *Oliver et al v. Barry White Family Trust et al*, Case No. 25-cv-03602 (S.D.N.Y.).

Please update the response, ensure that it is complete, and confirm that all responsive information has been provided and is accurate.

Respectfully submitted,

HERBSMAN HAFER WEBER  
& FRISCH, LLP

A handwritten signature in blue ink, appearing to read "Dorothy M. Weber", is written over the printed name.

Dorothy M. Weber, Esq.

DMW/rr

cc: Mr. Joe Cooley